

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

EDWARD SPECHT, an individual; on
behalf of himself and all others
similarly situated,

Plaintiff,

-against-

ANSWER

15-CV-2159

EASTERN ACCOUNT SYSTEM OF CONNECTICUT,
INC., A Connecticut Corporation;
JOSEPH P. COURTNEY, JR., individually
and in his Official Capacity; and
JOHN AND JANE DOES NUMBERS 1 THROUGH
25,

Defendants.

-----x

Defendants EASTERN ACCOUNT SYSTEM OF CONNECTICUT, INC. and
JOSEPH P. COURTNEY JR., by their attorneys, Barron & Newburger, P.C.
answers plaintiff's complaint as follows:

1. Defendants acknowledges being sued pursuant to the Fair
Debt Collection Practices Act (FDCPA), but deny any violation thereof.

2. Defendants acknowledge being sued pursuant to the Federal
and State law, but deny any violation thereof.

3. This paragraph contains no factual allegations directed
against the defendants and requires no admissions or denials.

4. This paragraph contains no factual allegations directed
against the defendants and requires no admissions or denials.

5. This paragraph contains no factual allegations directed against the defendants and requires no admissions or denials.

6. This paragraph contains no factual allegations directed against the defendants and requires no admissions or denials.

7. This paragraph contains no factual allegations directed against the defendants and requires no admissions or denials.

8. Defendants acknowledge being sued pursuant to the Federal and State law, but deny any violation thereof.

9. Defendants admit the allegations contained paragraph "9" of the complaint.

10. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

11. Defendants admit the allegations contained in paragraph "11" of the complaint.

12. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "12" of the complaint.

13. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "13" of the complaint.

14. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "14" of the complaint.

15. Defendants admit the allegations contained in paragraph "15" of the complaint.

16. Defendants deny each and every allegation contained in paragraph "16" of the complaint.

17. Defendants deny each and every allegation contained in paragraph "17" of the complaint.

18. Defendants admit the allegations contained in paragraph "18" of the complaint.

19. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "19" of the complaint.

20. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "20" of the complaint.

21. Defendants admit the allegations contained in paragraph "21" of the complaint.

22. Defendants admit the allegations contained in paragraph "22" of the complaint.

23. Defendants admit the allegations contained in paragraph "23" of the complaint.

24. Defendants admit the allegations contained in paragraph "24" of the complaint.

25. Defendants admit the allegations contained in paragraph "25" of the complaint.

26. Defendants admit the allegations contained in paragraph "26" of the complaint.

27. Defendants deny each and every allegation contained in paragraph "27" of the complaint.

28. Defendants deny each and every allegation contained in paragraph "28" of the complaint.

29. Defendants deny each and every allegation contained in paragraph "29" of the complaint.

30. Defendants deny each and every allegation contained in paragraph "30" of the complaint.

31. Defendants deny each and every allegation contained in paragraph "31" of the complaint.

32. Defendants admit sending correspondence to plaintiff. The contents of the correspondence speaks for itself and does not require an admission or a denial.

33. Defendants admit the allegations contained in paragraph "33" of the complaint.

34. Defendants admit the allegations contained in paragraph "34" of the complaint.

35. Defendants admit the allegations contained in paragraph "35" of the complaint.

36. Defendants admit the allegations contained in paragraph "36" of the complaint.

37. Defendants admit the allegations contained in paragraph "37" of the complaint.

38. Defendants deny each and every allegation contained in paragraph "38" of the complaint.

39. Defendants deny each and every allegation contained in paragraph "39" of the complaint.

40. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "40" of the complaint.

41. Defendants admit the allegations contained in paragraph "41" of the complaint.

42. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "42" of the complaint.

43. Defendants admit the allegations contained in paragraph "43" of the complaint.

44. Defendants admit the allegations contained in paragraph "44" of the complaint.

45. Defendants admit the allegations contained in paragraph "45" of the complaint.

46. Defendants admit the allegations contained in paragraph "46" of the complaint.

47. Defendants admit the allegations contained in paragraph "47" of the complaint.

48. Defendants admit the allegations contained in paragraph "48" of the complaint.

49. Defendants admit the allegations contained in paragraph "49" of the complaint.

50. Defendants admit sending correspondence to the plaintiff. The content of the correspondence speaks for itself.

51. Defendants deny each and every allegation contained in paragraph "51" of the complaint.

52. Defendants admit the allegations contained in paragraph "52" of the complaint.

53. Defendants admit the allegations contained in paragraph "53" of the complaint.

54. Defendants deny each and every allegation contained in paragraph "54" of the complaint.

55. Defendants deny each and every allegation contained in paragraph "55" of the complaint.

56. Defendants deny each and every allegation contained in paragraph "56" of the complaint.

57. Defendants deny each and every allegation contained in paragraph "57" of the complaint.

58. Defendants deny each and every allegation contained in paragraph "58" of the complaint.

59. Defendants deny each and every allegation contained in paragraph "59" of the complaint.

60. Defendants deny each and every allegation contained in paragraph "60" of the complaint.

61. Defendants deny each and every allegation contained in paragraph "61" of the complaint.

62. Defendants deny each and every allegation contained in paragraph "62" of the complaint.

63. Defendants deny each and every allegation contained in paragraph "63" of the complaint.

64. Defendants deny each and every allegation contained in paragraph "65" of the complaint.

65. Defendants deny each and every allegation contained in paragraph "65" of the complaint.

66. Defendants deny each and every allegation contained in paragraph "66" of the complaint.

67. Defendants deny each and every allegation contained in paragraph "67" of the complaint.

68. Defendants deny each and every allegation contained in paragraph "68" of the complaint.

69. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "69" of the complaint.

70. Defendants deny that this matter is properly brought as a class action.

71. Defendants deny that this matter has properly been brought as a class action.

72. Defendants deny each and every allegation contained in paragraph "72" of the complaint.

73. Defendants deny each and every allegation contained in paragraph "73" of the complaint.

74. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "74" of the complaint.

75. Defendants deny each and every allegation contained in paragraph "75" of the complaint.

76. Defendants deny each and every allegation contained in paragraph "76" of the complaint.

77. Defendants deny each and every allegation contained in paragraph "77" of the complaint.

78. Defendants deny each and every allegation contained in paragraph "78" of the complaint.

79. Defendants deny each and every allegation contained in paragraph "79" of the complaint.

80. Defendants deny each and every allegation contained in paragraph "80" of the complaint.

81. Defendants deny each and every allegation contained in paragraph "81" of the complaint.

82. Defendants deny each and every allegation contained in paragraph "82" of the complaint.

83. Defendants deny each and every allegation contained in paragraph 83" of the complaint.

84. Defendants deny each and every allegation contained in paragraph "84" of the complaint.

85. Defendants deny each and every allegation contained in paragraph "85" of the complaint.

86. Defendants repeat and reallege its previous admissions and denials contained in paragraphs "1" through "85" of the complaint.

87. Defendants deny each and every allegation contained in paragraph "87" of the complaint.

88. Defendants repeat and reallege its previous admissions and denials contained in paragraphs "1" through "86" of the complaint.

89. Defendants deny each and every allegation contained in paragraph "89" of the complaint.

90. Defendants repeat and reallege its previous admissions and denials contained in paragraphs "1" through "89" of the complaint.

91. Defendants deny each and every allegation contained in paragraph "91" of the complaint.

92. Defendants deny each and every allegation contained in paragraph "92" of the complaint.

93. Defendants deny each and every allegation contained in paragraph "93" of the complaint.

94. Defendants deny each and every allegation contained in paragraph "94" of the complaint.

95. Defendants deny each and every allegation contained in paragraph "95" of the complaint.

96. Defendants deny each and every allegation contained in paragraph "96" of the complaint.

97. Defendants deny each and every allegation contained in paragraph "97" of the complaint.

98. Defendants deny each and every allegation contained in paragraph "98" of the complaint.

99. Defendants deny each and every allegation contained in paragraph "91" of the complaint.

100. Defendants deny each and every allegation contained in paragraph "100" of the complaint.

101. Defendants deny each and every allegation contained in paragraph "101" of the complaint.

102. Defendants deny each and every allegation contained in paragraph "102" of the complaint.

103. Defendants deny each and every allegation contained in paragraph "103" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY
June 10, 2015



ARTHUR SANDERS, ESQ.
BARRON & NEWBURGER, P.C.
Attorney for defendants
30 South Main Street
New City, NY 10956
845-499-2990

TO:

ABRAHAM KLEINMAN, ESQ.

KLEINMAN LLC

Attorney for plaintiff

626 RXR Plaza

Uniondale, NY 11556